

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO,
et al.,

Defendants.

CIVIL NO. 12-2039 (GAG)

**JOINT MOTION SUBMITTING PROPOSED AGENDA FOR THE
MAY 11, 2021, STATUS CONFERENCE**

TO THE HONORABLE COURT:

Plaintiff, the United States of America, and Defendants, the Commonwealth of Puerto Rico and the Puerto Rico Police Bureau (collectively, “the Parties”), in compliance with the Court’s Order of April 26, 2021 (Dkt. No. 1739) and with the concurrence of the Monitor and the Special Master, respectfully submit a proposed agenda for the status conference set for May 11, 2021. For cause, the Parties state, allege, and pray:

1. On April 26, 2021, the Court directed the Parties to confer with the Monitor and Special Master on a proposed agenda for the May 11, 2021, status conference and to submit the agenda by Tuesday, May 4, 2021. *Id.* On April 27, the United States sent a proposed agenda to the Commonwealth, Monitor, and Special Master for their consideration. The United States also set out a process for reaching consensus before the Court’s deadline.

2. On April 30, 2021, after receiving feedback on the initial proposal, the United States circulated an updated agenda to the Commonwealth, Monitor, and Special Master. As of this date, all have agreed to the updated agenda, which is attached hereto as Ex. A.

WHEREFORE, the Parties respectfully submit their proposed agenda with the concurrence of the Monitor and Special Master for the Court's consideration, in addition to any other topic or issue the Court may wish to address during the May 11, 2021, status conference.

WE HEREBY CERTIFY that today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico using the CM/ECF system, which will send a copy and notification of filing to the Monitor, the Special Master, and all counsel of record.

RESPECTFULLY SUBMITTED this 4th day of May, 2021,

For Plaintiff UNITED STATES OF
AMERICA:

STEVEN H. ROSENBAUM
Chief, Special Litigation Section

s/Luis E. Saucedo

TIMOTHY D. MYGATT
Deputy Chief

LUIS E. SAUCEDO (G01613)

JORGE CASTILLO (G02912)
Trial Attorneys

U.S. Department of Justice
Civil Rights Division
Special Litigation Section
950 Pennsylvania Avenue, NW
Washington, DC 20530

Telephone: (202) 598-0482

Fax: (202) 514-4883

luis.e.saucedo@usdoj.gov

jorge.castillo@usdoj.gov

Attorneys for Plaintiff

For Defendants COMMONWEALTH OF
PUERTO RICO, ET AL.:

CANCIO, NADAL & RIVERA, L.L.C.

P.O. Box 364966

San Juan, Puerto Rico 00936-4966

403 Muñoz Rivera Avenue

San Juan, Puerto Rico 00918

Tel. (787) 767-9625

s/Rafael Barreto-Solá

RAFAEL BARRETO-SOLÁ

USDC PR: 211801

rbarreto@cnr.law

s/Marta L. Rivera-Ruiz

MARTA L. RIVERA-RUIZ

USDC PR: 221201

mrivera@cnr.law

s/Gabriel A. Peñagaricano

GABRIEL A. PEÑAGARÍCANO

USDC PR: 212911

gpenagaricano@me.com

Attorneys for Defendants